

**Remarks/Arguments:**

These remarks and amendments are intended to be a complete response to the Office Action dated August 17, 2005, and the case is now believed to be in condition for allowance. Accordingly, reconsideration is respectfully requested. Claims 1-31 are pending in the application; claims 30 and 31 were withdrawn from consideration; claims 1-28 stand rejected at present; and, claim 29 is objected to. As Applicant previously discussed, with Examiner, on August 3, 2005, Applicant elected the invention of Group I, indicated by the claims 1 – 29, without traverse, and claim 29 was canceled. Claim 32 is added herein.

Claims 27 – 29 were object to for certain informalities. Amendments to the claims herein are made to correct such informalities.

Claims 1-4, 6-21, 23-26, and 28-29 are rejected under 35 U. S. C. 102(b) as being anticipated by Johnson et al. (5,325,921). Johnson teaches dissolving filter cake by solvating with an appropriate solvent (col. 4, lines 34-39), and the use of soluble particles, which are dissolvable salts, for building the filter cake (col. 4, lines 55-64). Johnson even teaches the use of oil soluble particles, as well as particulates which degrade with time and/or temperature (col. 5, lines 48-50). Further, Johnson teaches removing the filter cake after placing proppant (col. 4, line 34). However, Johnson fails to teach the invention as claimed by Applicant, or even forming a filter cake comprising a solid base-soluble material functioning on the basis of pH, and degrading the solid base-soluble material with a solid base-soluble material degradation agent while injecting a slurry of a proppant in a carrier fluid. Hence, as Johnson fails to teach each element, and limitation thereupon, as claimed herein, Applicant submits that Johnson does not anticipate claims 1-4, 6-21, 23-26, and 28-29.


Claim 5 was rejected under 35 U. S. C. 103(a) as being unpatentable over Johnson et al. in view of Zhou et al. (US 2004/0221989). Combining the teachings of Johnson, as discussed above, with the use of a buffer in the carrier fluid (Zhou) would fail to result in

the invention as claimed by applicants. Further, Johnson does not teach or suggest the role of pH in dissolving the filter cake, and as such, one of ordinary skill in the art would have no motivation to combine the pH buffer of Zhou with the Johnson process in which pH is irrelevant and not taught or suggested as a mechanism. Hence, Applicant submits that the rejection is not proper and withdrawal thereof is in order.

Claims 22 and 27 were rejected under 35 U. S. C. 103(a) as being unpatentable over Johnson et al. in view of James et al. (5,782,300). Combining the teachings of Johnson, as discussed above, with the bridge promoting material of James would fail to result in the invention as claimed by applicants. Therefore, Applicant believes that the rejection is not proper and request withdrawal thereof.

Amendments to claims have been made to place the application in better condition for allowance. Applicants submit that this paper is fully responsive to the comments in the Office Action and respectfully solicit for this application to be granted in light of these amendments and remarks. If the Examiner believes that the prosecution of the application would be facilitated by a telephone interview, Applicants invite the Examiner to contact the undersigned at 281-285-8606. The Commissioner is hereby authorized to charge any fees that may be required, or credit any overpayment, to Deposit Account No. 04-1579 (56.0720).

Respectfully submitted,

  
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